



CITES CoP20

Samarkand (Uzbekistan)



**WWF positions on key proposals for amendment of Appendices I and II to the Convention and
on other Key agenda documents**




General considerations with regard to our positions on proposals for amendment of Appendices I and II



1. With regard to proposals before the Conference of the Parties for amendment of Appendices I and II, WWF insists that the criteria set out in [Resolution Conf. 9.24 \(Rev. CoP17\)](#) on *Criteria for amendment of Appendices I and II* are the appropriate basis for decision-making, although enforcement considerations and precedents set by previous decisions may, on occasion, be relevant.
2. Our comments on those proposals where we have taken positions reflect our considered assessment of the relevant proposals by reference to these criteria.
3. Against a background of continued decline in many species that are in demand in international trade, including many that are already listed on Appendices I and II, our positions inevitably lean towards the listing of more species on the Appendices and, where there are no other alternatives, the transfer of species on Appendix II to Appendix I.
4. On this occasion there are no proposals for transfer of a species from Appendix II to Appendix I that we oppose.
5. By the same token, we are unable to support most of the proposals for transfer of species from Appendix I to Appendix II, or for the expansion of the scope of annotated Appendix II listings.
6. Nevertheless, as on previous occasions, where we are satisfied that a proposal to transfer a species from Appendix I to Appendix II clearly meets the relevant criteria, and where there are sufficient controls in place to ensure that such a measure would be unlikely to lead to unsustainable trade, such a proposal can and must be supported.



General considerations with regard to our positions on other agenda documents

1. In arriving at positions on other agenda documents, our primary objective is to bring about more effective implementation of the Convention, including through:
 - a. Better guidance to Parties on matters such as non-detriment findings and legal acquisition findings;
 - b. Clearer, more transparent and stronger provisions in relevant Resolutions and Decisions;
 - c. Closing loopholes;
 - d. Ensuring that Parties' national legislation is more effective;
 - e. Ensuring better compliance by Parties and (where relevant) non-Parties.
2. These objectives can best be achieved through transparent, participative and equitable decision-making processes at national and at multilateral levels.

Positions on proposals to amend Appendices I and II

| # | Scientific name | Common name | Proponent | Proposal | Position | |
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| <u>2</u> | <i>Gazella dorcas</i> | Dorcas gazelle | Benin, Burkina Faso, Côte d'Ivoire, European Union, Liberia, Mali, Mauritania, Niger, Nigeria, Senegal, Sudan, Tunisia | Include in Appendix II |  | This species has declined in most range States with overall estimated decline of more than 30% in the last three generations. It is widely hunted for meat, horns and other parts, and is internationally traded as meat, trophies and pets. SUPPORT |
| 3 | <i>Saiga tatarica</i> | Saiga antelope | Kazakhstan | Amend the annotation by adding the wording "except for specimens from the population <i>Saiga tatarica</i> of Kazakhstan" |  | The Kazakh saiga population can, at present, sustain a managed off-take (although it should be noted that the population is shared with neighbouring range States). However, in common with our positions on certain other species, we are not satisfied, at the time of writing, that prospective consumer countries have demonstrated that they can manage the retail trade in such a manner as to prevent laundering of illegally and unsustainably sourced horn from other countries. UNABLE TO SUPPORT |
| 4 | <i>Giraffa camelopardis</i> | Giraffe | Namibia, South Africa, United Republic of Tanzania, Zimbabwe | Delete the populations of Angola, Botswana, Eswatini, Malawi, Mozambique, Namibia, South Africa and Zimbabwe from Appendix II |  | While the populations in these countries are, in general, well managed, stable and increasing, we note that, according to Annex 3 of Resolution Conf. 9.24 (Rev. CoP17) on <i>Criteria for amendment of Appendices I and II</i> , split-listings that place some populations of a species in the Appendices, and the rest outside the Appendices, should not be permitted. UNABLE TO SUPPORT |


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| 5 | <i>Okapia johnstoni</i> | Okapi | Democratic Republic of the Congo | Include in Appendix I |  | A case can be made that it meets the restricted distribution and decline criteria (a decline of 50% in three generations can reasonably be inferred). While the most pressing threats to the species lie elsewhere, our conclusion is that it meets the listing criteria and that an Appendix I listing can contribute to conservation of the species. SUPPORT |
| 9 | <i>Ceratotherium simum simum</i> | White rhinoceros | Namibia | Amend the annotation of the population of <i>Ceratotherium simum simum</i> of Namibia listed in Appendix II: For the exclusive purpose of allowing international trade in: a) live animals for in-situ conservation only; b) hunting trophies; and c) trade in rhino horn stocks owned by the Government and the Private Landowners originating in the State (excluding seized rhinoceros horn and rhinoceros horns of unknown origin); subject to the following: i) only stocks registered with the Government; ii) only horns with RHODIS certificates; iii) only to trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestics trade controls; and iv) not before the Secretariat has verified prospective importing countries and the registered stocks. All other specimens shall be deemed to be specimens of species included in Appendix I, and the trade in them shall be regulated accordingly. |  | WWF recognises Namibia's success in increasing its rhino population while implementing a sustainable use model. In that regard, our concerns are not based on considerations as to whether or not that population can sustain well-regulated trade, but rather to the lack of governance in potential consumer countries. Currently the Standing Committee does not have the capacity to engage in the type of scrutiny exercise that was undertaken for a similar proposal for ivory between 2006 and 2008. Nor is it apparent than any likely purchasing country has the necessary controls in place that would satisfy the Standing Committee; indeed, the logistics of establishing robust controls are considerable. Without such controls there is a real risk that legal trade could facilitate laundering and lead to increased poaching. UNABLE TO SUPPORT |

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| <u>10</u> | <i>Diceros bicornis bicornis</i> | Southern black rhinoceros | Namibia | Transfer the population of <i>Diceros bicornis bicornis</i> of Namibia from Appendix I to Appendix II with the following annotation: For the exclusive purpose of allowing trade in registered rhinoceros horn, whole or pieces subject to the following: i) only registered Government-owned stock, originating in the State (excluding seized rhinoceros horn and rhinoceros horns of unknown origin); ii) only horns with RHODIS certificates; iii) only to trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestic trade controls; iv) not before the Secretariat has verified prospective importing countries and the registered stocks; and v) the proceeds of this trade are used exclusively for rhinoceros conservation and community development programmes within or adjacent to the rhinoceros range. All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly. |  | <p>WWF recognises Namibia's success in increasing its rhino population while implementing a sustainable use model. In that regard, our concerns are not based on considerations as to whether or not that population can sustain well-regulated trade, but rather to the lack of governance in potential consumer countries.</p> <p>Currently the Standing Committee does not have the capacity to engage in the type of scrutiny exercise that was undertaken for a similar proposal for ivory between 2006 and 2008. Nor is it apparent than any likely purchasing country has the necessary controls in place that would satisfy the Standing Committee; indeed, the logistics of establishing robust controls on trade in rhino horn are considerable. Without such controls there is a real risk that legal trade could facilitate laundering and lead to increased poaching.</p> <p>UNABLE TO SUPPORT</p> |
| <u>12</u> | <i>Cercocebus chrysogaster</i> | Golden-bellied mangabey | Democratic Republic of the Congo | Transfer from Appendix II to Appendix I |  | <p>Based on the red list assessment the species appears to meet the decline criteria due to the high levels of hunting, domestic consumption and loss of habitat. In addition, the species is traded internationally for meat and as pets. We conclude that the Appendix I criteria are met, but we note that the Appendix I listing will not be effective unless stronger actions are taken with respect to domestic take and trade. SUPPORT</p> |


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| 13 | <i>Loxodonta africana</i> | African savannah elephant | Namibia | To allow Namibia to trade in registered stocks of raw ivory (whole tusks and pieces) of Namibian origin, owned by the Government of the Republic of Namibia, for commercial purposes with trading partners that have been verified by the CITES Secretariat as having sufficient national legislation and domestic trade controls. This ensures that ivory imported from Namibia will not be re-exported and will be managed following all requirements of Resolution Conf. 10.10 concerning domestic manufacturing and trade. Furthermore, to enable Namibia to achieve full Appendix II status for its elephants, as provided for in Article IV of the Convention, thereby permitting the regulated and legal trade in Namibian elephant products, including ivory. | ● | While Namibia's elephant population continues to meet the Appendix II criteria, this does not mean that trade in ivory is appropriate, or even feasible, at this time. Neither of the trading partners previously verified by the Secretariat could be considered to qualify automatically as trading partners now; China has banned domestic trade, while there are questions about the levels of controls in Japan. UNABLE TO SUPPORT |













Confiscated ivory © Andy Isaacson / WWF-US

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| 14 | <i>Loxodonta africana</i> | African savannah elephant | Botswana, Cameroon, Côte d'Ivoire, Namibia, Zimbabwe | <p>Amendments to Annotation A10 pertaining to the elephant populations of Botswana, Namibia, South Africa and Zimbabwe to harmonize the conditions of trade in live African elephants (deleted text reflected as strike through and text inserted bolded: For the exclusive purpose of allowing:</p> <p>trade in hunting trophies for non-commercial purposes;</p> <p>trade in live animals to appropriate and acceptable destinations, as defined in Resolution Conf. 11.20 (Rev. CoP18), for Botswana and Zimbabwe and for in situ conservation programmes for Namibia and South Africa;</p> <p>trade in hides;</p> <p>trade in hair;</p> <p>trade in leather goods for commercial or non-commercial purposes for Botswana, Namibia and South Africa and for non-commercial purposes for Zimbabwe;</p> <p>trade for non-commercial purposes in individually marked and certified ekipas incorporated in finished jewellery for non-commercial purposes for Namibia and ivory carvings for non-commercial purposes for Zimbabwe;</p> <p>trade in registered raw ivory (for Botswana, Namibia, South Africa and Zimbabwe, whole tusks and pieces)</p> <p>subject to the following:</p> <p>only registered government-owned stocks, originating in the State (excluding seized ivory and ivory of unknown origin);</p> |  | <p>This is the amendment that was agreed by consensus at the African elephant range State dialogue meeting in Botswana in 2024. The substantive effects of the changes are: 1. to remove any reference to what became the one-off sale, and any other mention of commercial trade in raw ivory; and 2. to allow commercial trade in leather goods from Zimbabwe, as had previously been allowed for other range States. The text is acceptable to us as it stands. Should any amendments be proposed, WWF's priority is that the text should not be diluted and that a consensus outcome is achieved, if possible. SUPPORT</p> |



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| | | | | <p>only to trading partners that have been verified by the Secretariat, in consultation with the Standing Committee, to have sufficient national legislation and domestic trade controls to ensure that the imported ivory will not be re-exported and will be managed in accordance with all requirements of Resolution Conf. 10.10 (Rev. CoP18) concerning domestic manufacturing and trade;</p> <p>not before the Secretariat has verified the prospective importing countries and the registered government-owned stocks;</p> <p>raw ivory pursuant to the conditional sale of registered government-owned ivory stocks agreed at CoP12, which are 20,000 kg (Botswana), 10,000 kg (Namibia) and 30,000 kg (South Africa);</p> <p>in addition to the quantities agreed at CoP12, government-owned ivory from Botswana, Namibia, South Africa and Zimbabwe registered by 31 January 2007 and verified by the Secretariat may be traded and dispatched, with the ivory in paragraph g) iv) above, in a single sale per destination under strict supervision of the Secretariat;</p> <p>the proceeds of the trade are used exclusively for elephant conservation and community conservation and development Programmes within or adjacent to the elephant range; and</p> <p>the additional quantities specified in paragraph g) v) above shall be traded only after the Standing Committee has agreed</p> | | |



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| | | | | <p>that the above conditions have been met;</p> <p>and</p> <p>no further proposals to allow trade in elephant ivory from populations already in Appendix II shall be submitted to the Conference of the Parties for the period from CoP14 and ending nine years from the date of the single sale of ivory that is to take place in accordance with provisions in paragraphs g) i), g) ii), g) iii), g) vi) and g) vii). In addition, such further proposals shall be dealt with in accordance with Decisions 16.55 and 14.78 (Rev. CoP16).</p> <p>On a proposal from the Secretariat, †The Standing Committee can decide to cause this trade to cease partially or completely in the event of non-compliance by exporting or importing countries, or in the case of proven detrimental impacts of the trade on other elephant populations. All other specimens shall be deemed to be specimens of species included in Appendix I and the trade in them shall be regulated accordingly.</p> | | |
| 15 | <i>Bycanistes</i> spp. and <i>Ceratogymna</i> spp. | Frugiferous hornbills | Cameroon, Congo, Gabon, Niger, Nigeria, Senegal, Sierra Leone, Togo | Include in Appendix II |  | While the casques are hollow and, thus, not suitable for carving as is the case for helmeted hornbill, these casques are traded internationally as ornaments. All nine species have undergone population decreases except for <i>B. subcylindricus</i> (status unknown). In addition, the observation of trade for pets in Japan, which hosts a significant market for exotic pets, suggests that the pet market constitutes a potential risk for exploitation. SUPPORT |

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| <u>16</u> | <i>Gyps africanus</i> and <i>gyps rueppelli</i> | White-backed vulture and Rüppell's vulture | Benin, Burkina Faso, Burundi, Cameroon, Chad, Congo, Gambia, Guinea, Niger, Nigeria, Senegal, Sierra Leone, Togo | Transfer from Appendix II to Appendix I |  | While the information on population declines is not comprehensive, it does allow for inference of at least a 50% population decline over three generations. In addition, although historically the trade was largely domestic, cross-border trade is now occurring. SUPPORT |
| <u>17</u> | <i>Falco peregrinus</i> | Peregrine falcon | Canada, United States of America | Transfer from Appendix I to Appendix II |  | By the 1970s, populations had crashed, due to the effect of DDT accumulating in the food chain, and the species acquired "iconic" status as symbolising the threat from that pesticide. However, with the banning of DDT, populations have bounced back across the species' wide range. IUCN now rates it as Least Concern. CITES trade data indicate that an average of 1,551 live birds were exported per year from 51 countries from 2015 to 2024 - over eighty percent of all specimens were captive-bred from source code C or D. Numbers of key exporters are small and most are within the European Union, which has strong controls in place. Given these factors, WWF does not anticipate that a downlisting will result in widespread trade in wild-taken birds. Rather, we support this proposal because we consider it important that, in the 50th year of its existence, CITES demonstrates maturity and recognises when a species, however iconic, no longer meets the Appendix I criteria. SUPPORT |
| <u>18</u> | <i>Sporophila angolensis</i> , <i>S. atrisrostris</i> , <i>S. crassirostris</i> , <i>S. funerea</i> and <i>S. maximiliani</i> | Seedeaters | Brazil | Include <i>Sporophila maximiliani</i> in Appendix I and include <i>Sporophila angolensis</i> , <i>Sporophila atrisrostris</i> , <i>Sporophila crassirostris</i> , <i>Sporophila funerea</i> and <i>Sporophila nuttingi</i> in Appendix II |  | <i>Sporophila maximiliani</i> is classified as Endangered by IUCN. Globally, the estimated number of adult birds ranges between 1,000 and 2,499 individuals, so the Appendix I criteria are easily met. The species is popular in both domestic and international trade because of its song. Distinguishing this species from other <i>Sporophila</i> species can be difficult due to sexual dimorphism and the difficulty of identifying juveniles. SUPPORT |



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| <u>19</u> | <i>Caribicus warreni</i> | Haitian giant galliwasp | Dominican Republic | Include in Appendix I |  | The population could be as low as 66 individuals, based on mark and recapture surveys, and the species is in demand in trade. SUPPORT |
| <u>20</u> | <i>Phyllurus amnicola</i> | Riverine leaf-tailed gecko | Australia | Include in Appendix II |  | The species occurs in one protected area in Australia, and the small population has been affected by an illegal harvest event. There is no legal trade, and it is not clear that any captive bred specimens originate from legally obtained founder stock. Overall, the species would probably qualify for Appendix I. SUPPORT |
| <u>21</u> | <i>Phyllurus caudiannulatus</i> | Bulburin leaf-tailed gecko | Australia | Include in Appendix II |  | This species is endemic to South-east Queensland. Although mainly threatened by climate change and bush fires, it is also in demand in trade. As with <i>P. amnicola</i> , there is no legal trade, and it is not clear that any captive bred specimens originate from legally obtained founder stock. SUPPORT |
| <u>22</u> | <i>Amblyrhynchus spp.</i> | Galapagos marine iguanas | Ecuador | Transfer from Appendix II to Appendix I |  | Based on a precautionary approach, and given the vulnerability of the species to extrinsic factors, these species merit listing on Appendix I. SUPPORT |
| <u>23</u> | <i>Conolophus spp.</i> | Galapagos terrestrial iguanas | Ecuador | Transfer from Appendix II to Appendix I |  | Based on a precautionary approach, and given the vulnerability of the species to extrinsic factors, these species merit listing on Appendix I. SUPPORT |
| <u>24</u> | <i>Bitis harena</i> and <i>Bitis parviocula</i> | Bale Mountain adders | Ethiopia | Include in Appendix I |  | While deforestation is, perhaps, a more immediate threat, and while noting that there is no legal trade, these species qualify for Appendix I based on their restricted distribution. SUPPORT |
| <u>26</u> | <i>Kinixys homeana</i> | Home's hinge-backed tortoise | Cameroon, Guinea, Nigeria, Togo | Transfer from Appendix II to Appendix I |  | Based on the decline in area of suitable habitat this species meets the decline criterion for Appendix I, and there is high demand, which has resulted in widespread illegal trade. SUPPORT |



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| <u>27</u> | <i>Pelophylax epeiroticus</i> , <i>P. lessonae</i> , <i>P. ridibundus</i> and <i>P. Shqipericus</i> | Edible water frogs | European Union, Israel, North Macedonia | Include in Appendix II (Entry into effect of the inclusion in Appendix II would be delayed by 18 months, i.e. until 5 June 2027.) |  | <i>Pelophylax epeiroticus</i> , <i>P. ridibundus</i> and <i>P. shqipericus</i> are proposed on the basis of Article II(2)(a) of the Convention, while <i>P. lessonae</i> is proposed on the basis of Article II(2)(b). The volume of trade is vast, and legislative regulation is lacking in the main exporting countries. The IUCN Red List categorised <i>P. shqipericus</i> as Vulnerable and <i>P. epeiroticus</i> as Near Threatened, both with a declining population trend. While <i>P. ridibundus</i> was categorised as Least Concern with a stable population trend, several taxa that are now recognised as synonyms of <i>P. ridibundus</i> were categorised by the IUCN as Threatened, including <i>P. r. cerigensis</i> as Endangered and both <i>P. r. caralitanus</i> [as <i>P. caralitanus</i>] and <i>P. r. cypriensis</i> as Vulnerable with a decreasing population trend. SUPPORT |
| <u>28</u> | <i>Carcharhinus longimanus</i> | Oceanic white-tip shark | Argentina, Bahamas, Brazil, Comoros, Dominican Republic, Ecuador, European Union, Fiji, Gabon, Honduras, Lebanon, Oman, Panama, Samoa, Senegal, Seychelles, Sri Lanka, Sudan, Togo, United Kingdom of Great Britain and Northern Ireland | Transfer from Appendix II to Appendix I |  | Already when this was listed on Appendix II in 2013 it was argued that it could qualify for Appendix I. Since then, it has been reclassified as Critically Endangered. This assessment, based on a time-series of relative abundance throughout its range, and a recent fisheries stock assessment in the Western Central Pacific Ocean, show there has been a marked global population decline in the wild of greater than 80% in the last three generations, and indicate that the species is still declining, conclusively meeting the CITES Appendix I listing criteria. SUPPORT |


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| <u>29</u> | <i>Galeorhinus galeus</i> and <i>Mustelus spp.</i> | Tope shark and smooth hound sharks | Brazil, Ecuador, European Union, Panama, Senegal | Include in Appendix II |  | <p><i>Galeorhinus galeus</i>, <i>Mustelus schmitti</i>, and <i>Mustelus mustelus</i> are proposed on the basis of Article II(2)(a) of the Convention, while all other species in the genus <i>Mustelus</i> are proposed on the basis of Article II(2)(b). All populations of <i>M. schmitti</i> and <i>M. mustelus</i>, and most populations of <i>G. galeus</i>, have declined severely due to unsustainable fisheries, largely driven by international trade demand for their meat and fins. Targeted catches and/or utilised incidental catch (bycatch) from depleted populations continue to drive these declines. <i>M. schmitti</i> and <i>G. galeus</i> are classified in the IUCN Red List as Critically Endangered globally due to an over 80% global population reductions over the last three generations. <i>M. mustelus</i> is classified as Endangered due to a global population reduction of 50-79% over the last three generations. As such, <i>M. schmitti</i> and <i>G. galeus</i> already meet the Appendix I biological decline criterion. The specimens of other species in genus <i>Mustelus</i> (smooth-hounds) in the form in which they are traded resemble specimens of <i>G. galeus</i>, <i>M. mustelus</i> and <i>M. schmitti</i> so that enforcement officers who encounter specimens of CITES-listed species are unlikely to be able to distinguish between them. SUPPORT</p> |
| <u>30</u> | Mobulidae spp. | Mobula rays | Bahamas, Belize, Brazil, Comoros, Dominican Republic, Ecuador, Fiji, Gabon, Jamaica, Maldives, Panama, Samoa, Senegal, Seychelles, Sudan, Togo | Transfer from Appendix II to Appendix I |  | <p>Dozens of studies spanning all mobulid species and ocean regions have revealed ongoing and alarming population declines in recent years. The steepness of these declines has been greatest in the last decade, after CITES Appendix II listings of these species, suggesting the acceleration of the depletion of all mobulid species despite these listings. Since mobulids are amongst the slowest growing marine species, members of this family fall outside the typical range of marine species productivity and qualify for listing</p> |



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| | | | | | | following a lesser decline than the ranges stipulated in the footnote to 9.24 (Rev CoP17). We note further that declines are all within one or two generations, or in some cases, less than one generation. SUPPORT |
| <u>31</u> | <i>Rhincodon typus</i> | Whale shark | Argentina, Bahamas, Bangladesh, Belize, Comoros, Dominican Republic, Ecuador, Fiji, Gabon, Maldives, Panama, Philippines, Samoa, Senegal, Seychelles, Sri Lanka, Togo | Transfer from Appendix II to Appendix I |  | An estimated global decline of 40-92% in the past three generations prompted IUCN to assess this species as Endangered with a declining population trend in 2016, a heightened degree of concern compared to its designation as Vulnerable when listed on CITES Appendix II at CoP12 in 2002. This status aligns with the Appendix I listing criteria (criteria C) points i and ii. Therefore, despite very limited trade, our judgement is that the proposal is justified. SUPPORT |
| <u>32</u> | <i>Glaucostegus</i> spp. | Giant guitarfish | Bangladesh, Benin, Brazil, Burkina Faso, Burundi, Cabo Verde, Central African Republic, Comoros, Congo, Gabon, Guinea, Guinea-Bissau, Maldives, Mali, Niger, Nigeria, Panama, Sierra Leone, Sudan, Togo | Add the following annotation "A zero annual export quota for wild-taken specimens traded for commercial purposes" |  | Currently, all seven species of <i>Glaucostegus</i> spp. are classified as Critically Endangered and experiencing global declines of 80-99% across their ranges. Despite this, they continue to be traded both legally and illegally and are found in global trade hubs of both Hong Kong Special Administrative Region of China and Singapore. They have some of the highest value fins on the international market, often making them both targeted species and commonly retained bycatch. SUPPORT |




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| 33 | Rhinidae spp. | Wedgefishes | Bangladesh, Benin, Brazil, Burkina Faso, Burundi, Central African Republic, Comoros, Congo, Gabon, Gambia, Guinea, Guinea-Bissau, Maldives, Mali, Niger, Nigeria, Panama, Senegal, Sierra Leone, Sudan, Togo | Add the following annotation "A zero annual export quota for wild-taken specimens traded for commercial purposes" |  | All but one of the 11 species in this family are classified by IUCN as Critically Endangered globally due to population declines driven by overfishing in artisanal and commercial fisheries, underpinned by limited management throughout most of both species' range. These species are especially susceptible to fisheries because of their use of coastal habitats, catchability in multiple gear types, relatively large size, and value in trade – all underpinned by a lack of adequate management. They have been found to have particularly low reproductive potential, which puts them at extreme risk when fisheries are not adequately managed. As some challenges remain with species-specific identification in areas where multiple species overlap in distribution, conservation actions should be focused at the family level. Rapid recent declines in populations of 80% or more are already documented in some regions as a result of overfishing driven by trade. SUPPORT |
| 34 | <i>Centrophoridae</i> spp. | Gulper sharks | Brazil, Comoros, Dominican Republic, Ecuador, European Union, Lebanon, Nigeria, Panama, Senegal, Syrian Arab Republic, United Kingdom of Great Britain and Northern Ireland | Include in Appendix II |  | <i>Centrophorus atromarginatus</i> and <i>C. granulosus</i> are proposed under Article II(2)(a) of the Convention and the remainder under Article II(2)(b). The first two have both undergone population declines of >80% in significant parts of their ranges due to overexploitation for the international liver oil trade, resulting in assessments by the IUCN of Critically Endangered for <i>C. atromarginatus</i> and Endangered for <i>C. granulosus</i> . Gulper sharks have among the highest value liver oil of all sharks and consequently they are targeted and increasingly retained from bycatch for the liver oil trade. The targeting and bycatch retention is mostly in unregulated and unmanaged fisheries which have driven dramatic and rapid population declines. Both species have extremely low biological productivity and thus, very |




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| | | | | | <p>limited ability to withstand exploitation, as evidenced by rapid population declines when targeted. Population declines are projected to continue due to the ongoing international demand for their high-quality liver oil. <i>C. atromarginatus</i> fulfils the biological criteria for inclusion in Appendix I. Both fulfil the CITES criteria for inclusion in Appendix II. It is likely that other species in the family Centrophoridae qualify for listing under Annex 2a in their own right. SUPPORT</p> |
| 35 | <i>Anguilla</i> spp. | Anguillid eels | European Union, Honduras, Panama | Include in Appendix II (Entry into effect would be delayed by 18 months, i.e. until 5 June 2027.) | <p><i>Anguilla japonica</i> and <i>Anguilla rostrata</i> are proposed under Article II(2)(a) of the Convention. Historically, <i>A. japonica</i> was the primary species supplying East Asian eel farms, but declines in this species led to increased reliance on <i>A. anguilla</i> and <i>A. rostrata</i>, particularly in farms in China. Following the inclusion of <i>A. anguilla</i> in Appendix II, followed by trade restrictions by the EU in 2010, combined with catastrophic declines (> 90%) in recruitment, <i>A. rostrata</i> has become a key source to supply eel farmss, equalling or surpassing <i>A. japonica</i> in volume. The remaining species are proposed under Article II(2)(b). As glass eels, or as adult eels killed and prepared for human consumption, all anguillid eel species are indistinguishable from one another. It is necessary not only to support the proposal, but to establish fisheries management organizations such as RFMOs, and to strongly advocate for the strengthening of fisheries and trade management in collaboration with CITES. Even if all species of eel are listed in CITES, there is a risk that the trade of will go underground, as in the case of European eel. However, this listing will only be effective if catch management measures are urgently implemented. SUPPORT</p> |



| # | Scientific name | Common name | Proponent | Proposal | Position |
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| 36 | <i>Actinopyga echinites</i> , <i>A. lecanora</i> , <i>A. mauritiana</i> , <i>A. miliaris</i> , <i>A. palauensis</i> and <i>A. varians</i> | Sea cucumbers | European Union | Include on Appendix II |  <p><i>A. echinites</i>, <i>A. mauritiana</i>, <i>A. miliaris</i> and <i>A. varians</i> are medium-value sea cucumber species that have been subjected to increased harvesting pressure over recent decades due to depletions of higher value sea cucumber species, driven by international demand. These species are often among the key target species in fisheries across the Indian and Pacific Oceans, and as a result are overfished in their habitats in some locations across these two regions. Evidence of recovery is variable, despite the closure of fisheries in several countries. All four species were categorized as Vulnerable with a declining population trend in 2010, and are undergoing current population declines of 30–40% due to depletion of stocks and ongoing overexploitation, principally driven by international trade. Historically, these species were also estimated to have undergone declines of 60–90% since the 1960s in parts of their range. The lifespan of these species likely covers decades and, despite a probable moderate-high productivity rate, populations have been slow to recover after depletion. Fertilisation success is density dependent, meaning that recovery is impeded where populations are at low density. These biological characteristics, coupled with occurrence in easily accessible shallow waters, make them vulnerable to overharvesting. SUPPORT</p> |

| # | Scientific name | Common name | Proponent | Proposal | Position | |
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| 37 | <i>Holothuria lessoni</i> | Golden sandfish (sea cucumber) | European Union | Include in Appendix II |  | <i>Holothuria lessoni</i> is a key target species in fisheries due to international demand for bêche-de-mer. Sea cucumbers are highly sought-after for their perceived biological and pharmaceutical benefits, as well as for extracts in the cosmetics industry. <i>H. lessoni</i> was categorized as Endangered in 2010 on the basis of an estimated global population decline exceeding 50% over the past 30–50 years due to unsustainable harvest. The species is susceptible to overfishing due to a combination of its occurrence in shallow water habitats and ease of accessibility. Despite a moderate-high productivity rate, populations have been slow to recover after depletion. Once populations become heavily depleted reproductive success diminishes. Sea cucumber fisheries tend to follow “boom and bust” cycles of intense capture followed by fishery collapse; heavy fishing pressure for <i>H. lessoni</i> has caused population declines in many range States including New Caledonia, Fiji, Vanuatu and Tonga. SUPPORT |
| 41 | <i>Jubaea chilensis</i> | Chilean wine palm | Chile | Include in Appendix I |  | This is an extremely slow-growing species endemic to Central Chile and is currently in legal trade. In particular, its fruit is highly sought after, and the removal of that fruit impacts regeneration. The proposal lacks numeric data to assess the Appendix I criteria, but the species probably qualifies on the basis of its restricted distribution. SUPPORT |

| # | Scientific name | Common name | Proponent | Proposal | Position | |
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| 43 | <i>Commiphora wightii</i> | Indian bdellium | European Union | Include in Appendix II |  | <i>Commiphora wightii</i> was categorized as Critically Endangered in a 2015 IUCN assessment on the basis of an estimated global population decline of over 80% over the past three generations, due to unsustainable harvest compounded by habitat loss and fragmentation. It is targeted for its oleo-resin, which has been used in Ayurvedic, Unani and Siddha traditional systems of medicine for thousands of years. Over the last century, commercial interest in the medicinal properties of this species has resulted in an expansion in both domestic and international markets. <i>C. wightii</i> is vulnerable to overexploitation, both because of its life history characteristics as well as the higher yields produced when destructive methods are used to harvest its gum. It is slow growing with a poor germination rate, and harvest is focused on mature individuals that are at least 5 years old (and 8-10 years old in India). SUPPORT |
| 44 | <i>Euphorbia bupleurifolia</i> | Pine cone plant | South Africa | Transfer from Appendix II to Appendix I |  | The species has seen a marked population decline of about 97% since 1975, primarily due to illegal collecting for the international ornamental succulent and local traditional medicine trade, and it is estimated that less than 2500 individuals remain in the wild. As such, it amply meets the Appendix I criteria. SUPPORT |
| 45 | <i>Afzelia bipindensis</i> | Apa | Burundi, Cameroon, Central African Republic, Congo, Democratic Republic of the Congo, Equatorial Guinea, Gabon | Delete the populations of Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea and Gabon from Appendix II |  | While it is possible that the timber of this species can be identified using anatomical and other advanced techniques, the proposal fails to demonstrate that the timber can be distinguished by enforcement officers who encounter it, which is the criterion for inclusion of species on Appendix II on lookalike grounds. UNABLE TO SUPPORT |

| # | Scientific name | Common name | Proponent | Proposal | Position | |
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| <u>46</u> | <i>Paubrasilia echinata</i> | Brazil wood or pernambuco | Brazil | Transfer from Appendix II to Appendix I |  | Based on the recorded loss of Atlantic rainforest cover and the population data on the species itself, it meets the Appendix I criteria. As such, notwithstanding any possible implementation difficulties, this proposal should be adopted. SUPPORT |
| <u>47</u> | <i>Pterocarpus soyauxii</i> | African padauk or African coralwood | Burundi, Cameroon, Central African Republic, Congo, Democratic Republic of the Congo, Equatorial Guinea, Gabon | Delete the populations of Angola, Cameroon, the Central African Republic, Congo, the Democratic Republic of the Congo, Equatorial Guinea and Gabon from Appendix II |  | While it is possible that the timber of this species can be identified using anatomical and other advanced techniques, the proposal fails to demonstrate that the timber can be distinguished by enforcement officers who encounter it, which is the criterion for inclusion of species on Appendix II on lookalike grounds. UNABLE TO SUPPORT |
| <u>50</u> | <i>Avonia quinaria</i> | Medusa | South Africa | Transfer from Appendix II to Appendix I |  | This slow-growing, long-lived succulent plant has faced estimated declines of 50% owing to collection for the horticulture trade, and further declines are anticipated in the near future. Demand for wild specimens is high because artificially propagated specimens take so long to enlarge. SUPPORT |



Positions on other key agenda documents

| Doc. | Title | Submitted by | Key points | Position language |
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| <u>15.1</u> | Roles of CITES in reducing risk of future zoonotic disease emergence associated with international wildlife trade: report of the Standing Committee | Standing Committee | Contains suggested measures to address pathogen spillover risks agreed by the Animals Committee, and draft Decisions mandating the Secretariat and Animals Committee to continue working on this topic, as well as directing actions to Parties to ensure inter-agency cooperation | The proposed draft Decisions ensure that CITES can contribute to prevention of future pathogen spillover, within its mandate, while acknowledging that international trade is only one element of risk. SUPPORT |
| <u>16.3</u> | Joint CITES-CMS African Carnivores Initiative | Animals Committee, in consultation with Standing Committee | Proposes: (1) an amendment to Resolution Conf. 13.3 on <i>Cooperation and synergy with the Convention on the Conservation of Migratory Species of Wild Animals</i> to mention explicitly those CMS-listed species covered by the initiative (cheetah, lion and leopard); and (2) draft Decisions mandating continuation of the initiative, encouraging support, and encouraging Parties to implement Resolutions and Decisions relating to those species | Currently, none of the three species mentioned are covered by specific Resolutions (although some more general Resolutions contain relevant provisions), so it is important that this initiative continue and that it be supported. SUPPORT |
| <u>25</u> | CITES gender action plan | Standing Committee | As the plan did not progress further than the outline stage, the document proposes renewal of the existing Decisions mandating development of the plan, with minimal editorial changes | WWF regrets that the plan could not be finalised in time for adoption at CoP20. We support renewal of the CoP19 Decisions, <i>mutatis mutandi</i> , and urge Parties and others to provide whatever support is necessary to ensure adoption of a plan at CoP21. SUPPORT |
| <u>26</u> | CITES global youth network | China, Costa Rica, Ghana, Kuwait, Philippines, Singapore, South Africa, Sudan, Zambia, Zimbabwe | Includes proposed amendments to Resolution Conf 17.5 (Rev. CoP18) on <i>Youth engagement</i> , providing for greater support to national networks and to the Global Youth Network, and for more structured participation by the Global Youth Network in future CoPs | WWF welcomes proposals for greater, more structured, engagement by youth in CITES processes, and, accordingly, supports the proposed amendments to Resolution Conf 17.5 (Rev. CoP18) on <i>Youth engagement</i> . SUPPORT |

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| <u>28</u> | Draft Resolution of the Conference of the Parties on the creation of an advisory sub-Committee of the Standing Committee of people living alongside fauna and flora species included in the CITES Appendices (PLFF), a related voluntary fund, and their procedures | Zimbabwe | Proposes a draft Resolution establishing such a sub-committee and a voluntary fund to accompany it | WWF agrees that increased engagement of Indigenous Peoples and Local Communities (IPs and LCs) in CITES can only serve to improve the information base for decision-making and support fair and effective implementation of meeting outcomes. Therefore, we believe that Parties should consider including IP and LC representatives on their delegations or accrediting them to attend as representatives of observer organisations. In that way, they can engage personally with Party delegates, can react to debates in real time and participate in both in-session and intersessional working groups as appropriate. While we are open to alternative approaches, currently we do not consider that a separate, parallel committee or sub-committee offers these advantages. We would also want meaningful consultations with IPs and LCs to continue so that they can be fully informed and express their preferences and discuss the pros and cons of various options. FURTHER DISCUSSION NEEDED |
| <u>35.1</u> | Implementation of Article XIII and resolution Conf. 14.3 (Rev. CoP19) on <i>CITES compliance procedures</i> | Secretariat | Includes a draft Decision mandating the Standing Committee to prepare draft guidance on the scope of recommendations to suspend trade in one or more species with a Party, and an amendment to Resolution Conf. 14.3 (Rev. CoP19) on <i>CITES compliance procedures</i> to append a template for a compliance action plan | Clarification is needed on the scope of recommendations to suspend trade, if only to ensure that different countries do not interpret the recommendations in different ways, so the draft Decision is supported in principle. However, as Paragraph 30 of Resolution Conf. 14.3 (Rev. CoP19) indicates, the Standing Committee may choose also to recommend trade suspensions in respect with non-Parties, if those Parties are not meeting the requirements of Article X of the Convention. So, the phrase "a Party subject to a compliance procedure" should be amended to " <u>a country</u> subject to a compliance procedure". The amendment to the Resolution is also supported. SUPPORT WITH AMENDMENTS |

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| <u>35.2</u> | Review of the National Ivory Action Plan process | Standing Committee | Includes proposed amendments to Annex 3 of Resolution Conf. 10.10 (Rev. CoP19) on <i>Trade in elephant specimens</i> , that annex being the guidance for the National Ivory Action plan process. The amendments come from the Standing Committee's consideration of an independent review of the process mandated by CoP19. Not all the outcomes of that review are addressed in the amendments, and the document also includes a draft Decision mandating continued work on the review by the Standing Committee | WWF welcomes this document and supports the amendments to Annex 3 of Resolution Conf. 10.10 (Rev. CoP19) on <i>Trade in elephant specimens</i> . Noting that the long-term recommendations in the review have not been addressed we also support the draft Decision for the Standing Committee to continue working on the issue. In particular, we still consider that the proposal for an expert oversight body should receive careful consideration. The MIKE-ETIS TAG would be the most appropriate choice. QUALIFIED SUPPORT |
| <u>35.3</u> | Totoabas (<i>Totoaba macdonaldi</i>) | Secretariat | The document reports on developments since CoP19. It includes draft Decisions aimed at range, transit and consumer countries. In particular, Mexico is required to implement measures to effectively prevent fishers from using gillnets in the Vaquita Refuge Area (VRA) and vessels from entering the Vaquita Zero-Tolerance Area (Zo) and to maintain strict control over vessels using alternative gear | WWF welcomes this document and the draft Decisions therein. We consider that Decision 20.H should be amended as follows: "The Standing Committee shall review the reporting submitted by Parties and the Secretariat in accordance with Decisions 20.CC to 20.GG and make recommendations, <u>including recommendations to suspend trade</u> , as appropriate". SUPPORT WITH AMENDMENT |
| <u>36</u> | Review of Resolution Conf. 17.7 (Rev. CoP19) on review of trade in animal specimens reported as produced in captivity | Standing Committee, in consultation with the Chair of the Animals Committee | Proposes some amendments to the Resolution, the main substantive one being that the process should take into account the impact of the removal of founder stock from the wild. A draft Decision is proposed for the development of a tracking database | WWF welcomes this document and the recommendations therein, in particular, the proposal that this process take into account the impact of the removal of founder stock from the wild for captive breeding operations. SUPPORT |
| <u>37</u> | Possession of specimens of species included in Appendix I | Standing Committee | Recommends that: (1) Parties whose legislation is in Category 2 and Category 3 under the National Legislation Project be reminded that possession of illegally traded specimens of CITES-listed species is one of the areas being analysed by the Secretariat in the context of the review of national legislation; and (2) Parties whose legislation is in Category 1 be invited to identify potential loopholes in their national CITES-implementing legislation, in particular with regard to the | WWF welcomes this document, believing that possession of specimens of Appendix I species should be illegal unless the owner, when asked, can prove legal origin. SUPPORT |

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| | | | possession of illegally traded specimens of CITES-listed species, and to adopt any necessary amendments. Amendments to Resolution Conf 8.4 (Rev. CoP15) on <i>National laws for implementation of the Convention</i> are also proposed to highlight the issue of possession of specimens | |
| 38 | Review of Resolution Conf. 11.3 (Rev. CoP19) on <i>Compliance and enforcement</i> | Standing Committee | Amendments are proposed to the Resolution, the main substantive ones being to ensure that professional bodies that represent and/ or accredit various professions are made aware of CITES obligations and held to higher standards when they breach them | WWF welcomes this document, emphasising that at last the roles and responsibilities of professional bodies are addressed, as we had advocated. That said, we consider that the Resolution is becoming unwieldy and that elements could be the subject of stand-alone Resolutions (e.g. wildlife crime linked to the internet) or included in other existing Resolutions. Section IX relating to Article XIII could be included in Resolution Conf. 14.3 (Rev. CoP19) on <i>CITES compliance procedures</i> , while Section II on due diligence could be included in Resolution Conf. 18.7 on <i>Legal acquisition findings</i> . Accordingly, we recommend that the CoP consider this and adopt additional Decisions to mandate further work in the next intersessional. SUPPORT WITH AMENDMENT |
| 39 | Enforcement matters | Secretariat | Includes: 1. proposed amendments to Resolution Conf. 17.6 (Rev. CoP19) on <i>Prohibiting, preventing, detecting and countering corruption, which facilitates activities conducted in violation of the Convention</i> , calling on Parties to ensure that corruption risk mitigation policies and strategies are in place to address corruption risks associated with wildlife crime, and to ensure collaboration between CITES Management Authorities and anti-corruption authorities; 2. proposed amendments to Resolution Conf. 11.3 (Rev. CoP19) on <i>Compliance and enforcement</i> calling on Parties to integrate financial crime investigations into the investigation of crimes involving wildlife and increase the use of financial investigation techniques to identify criminals and their networks and address associated illicit financial flows from these crimes; and | WWF supports the proposals in the document. However, we believe that the issue of tackling the proceeds of wildlife crime is sufficiently important and complex to warrant a separate Resolution (also in line with our comments on Document 38), so we believe the draft Decision should be amended so that the end of the sentence reads: "to <u>develop a Resolution incorporating</u> provide Parties with guidance on the measures they can take to combat money laundering associated with wildlife crime, and to promote the integration of financial crime investigations into the investigation of crimes involving wildlife." SUPPORT WITH AMENDMENTS |

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| | | | 3. a draft Decision mandating the development of guidance on the measures Parties can take to combat money laundering associated with wildlife crime, and to promote the integration of financial crime investigations into the investigation of crimes involving wildlife | |
| <u>41</u> | CITES Big cats task force | Standing Committee | Draft Decisions are proposed encouraging Parties to act on the strategies, measures and activities outlined in the <u>Big cat task force outcome document</u> , and for the Standing Committee to review Parties' activities | WWF supports the draft Decisions. However, given the urgency and complexities of trade in big cats, we consider that the task force should meet again before CoP21 (or, better, before SC 82) so a further Decision should be adopted mandating this. SUPPORT WITH AMENDMENTS |
| <u>42</u> | Implementation of the priority recommendations from the review of the ETIS programme | Standing Committee | Draft Decisions are proposed mandating the MIKE-ETIS Technical Advisory group to continue work on the data validation protocol | As a major donor to ETIS, WWF notes that the draft protocol does not adequately address the issue of records with unresolved validation requests, noting further that their automatic exclusion affects the outcomes of the analyses. We reiterate that, while Parties are entitled to query data in ETIS, they should not have the final say in its inclusion or exclusion. In addition, the document does not discuss the financial sustainability of ETIS, which emerged as a major issue in the review. FURTHER DISCUSSION NEEDED |
| <u>43</u> | ETIS categorization of Parties | Standing Committee | It is proposed that the methodology for categorization of Parties proposed in <u>SC78 Doc. 65.3</u> be adopted by the CoP. However, while the document acknowledges that the Standing Committee agreed that the contextual information in Paragraph 10 of that document (Corruption Perception Index, Organised Crime Index and published literature) be used by TRAFFIC as part of the categorization process, these are now missing from the criteria as proposed for adoption in the present document | Some of the criteria remain vague - e.g. what is meant by "among the highest volume of illegal trade compared to others"? On the other hand, some adaptability and flexibility have to be incorporated into the criteria, especially with regard to numeric thresholds. We also call for the explicit inclusion of the contextual information mentioned in Paragraph 10 of <u>SC78 Doc. 65.3</u> (Corruption Perception Index, Organised Crime Index and published literature). QUALIFIED SUPPORT |

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| 45 | Illegal trade in cheetahs (<i>Acinonyx jubatus</i>) | Standing Committee | Proposes draft Decisions encouraging Parties that are affected by illegal trade in cheetahs to fully implement the recommendations in the <u>Big cat task force outcome document</u> , review legislation, strengthen international cooperation, and follow the recommendations in the document <u>Wildlife Crime Linked to the Internet: Practical Guidance for Law Enforcement Officers</u> , with a mandate to the Standing Committee to review progress | WWF welcomes the continued spotlight on this issue and supports adoption of the draft Decisions. SUPPORT |



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| <u>46</u> | Marine turtles (Chelonidae spp. and Dermochelyidae spp.) | Standing Committee | Proposes amendments to Resolution Conf. 19.5 on <i>Conservation of and trade in marine turtles</i> , strengthening the provisions on donor and in-kind support, legislation, unsustainable and illegal trade, forensic sampling, bycatch etc. | WWF participated in the revision of the Resolution and supports the amendments. We draw particular attention to the need for forensic sampling of marine turtles. SUPPORT |
| <u>47.1</u> | Tortoises and freshwater turtles (Testudines spp.): Report of the Standing Committee and the Secretariat | Standing Committee and Secretariat | Includes draft Decisions directed to Madagascar, other Parties affected by illegal trade in tortoises and freshwater turtles, the Secretariat, the Animals Committee and the Standing Committee, directing Madagascar to update and report on its Action Plan for the Conservation of its endemic tortoises and freshwater turtles, and directing the Secretariat to facilitate consideration of these reports by the Committees. A small amendment is also proposed to Resolution Conf. 11.9 (Rev. CoP18) on <i>Conservation of and trade in tortoises and freshwater turtles</i> | Madagascar's endemic tortoises and freshwater turtles are a key component of its rich biodiversity and are severely threatened by illegal trade. SUPPORT |
| <u>47.2</u> | Tortoises and freshwater turtles (Testudines spp.): Trade in Tortoises and freshwater turtles from Madagascar | European Union in consultation with Madagascar | Includes draft Decisions directed primarily to Madagascar to step up its implementation of the <u>Global Action Plan for the Conservation of Madagascar's endemic tortoises and freshwater turtles</u> | The document's recommendations are constructive, and we encourage the CoP to merge them with those in Document 47.1. SUPPORT |
| <u>48</u> | Proposal to amend Resolution Conf. 12.3 (Rev. CoP19) | Burundi, Cameroon, Central African Republic, Congo, Democratic republic of Congo, Equatorial Guinea, Gabon | Proposed amendments would require importing countries to accept the listing of a specimen on an export permit as proof of legal acquisition of that specimen in the country of origin. They would also impose binding time periods for resolution of situations where exports were refused, after which the Secretariat would refer to the cases to the Animals or Plants Committee for response within a defined time period | WWF acknowledges that delays in processing imports can be disruptive and costly for the exporter. However, the proposal that export permits are taken at face value is inconsistent with the requirements of paragraph I of Resolution Conf. 11.3 (Rev. CoP19). Furthermore, the procedures proposed for resolution of disputes are costly and impracticable. UNABLE TO SUPPORT |
| <u>49</u> | Legal acquisition findings | Secretariat at the request of the Standing Committee | Incorporates draft Decisions allowing for testing and refinement of the Rapid guidelines for making of legal acquisition findings, some technical amendments to Resolution Conf. 18.7 (Rev. CoP19) on <i>Legal acquisition findings</i> , and guidelines on chain of custody | WWF thanks the Secretariat, FAO and others for their continued work on this important issue. SUPPORT |

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| <u>50</u> | Non-detriment findings | Animals and Plants Committees | Incorporates draft Decisions allowing for testing and refinement of the guidelines developed at the 2023 Nairobi workshop | WWF thanks the donors, the Secretariat, the various consultants and other participants who developed these guidelines and supports the draft Decisions. SUPPORT |
| <u>52</u> | Introduction from the sea | Standing Committee | Includes draft Decisions mandating the Secretariat to monitor the implementation of Resolution Conf. 14.6 (Rev. CoP16) on <i>Introduction from the sea</i> and directing the Standing Committee to consider the need for revision of the Resolution to reflect the BBNJ agreement and to address the issues raised in Document 51 | As our understanding of the issues arising with respect to introduction from the sea grows, we need to monitor implementation of Resolution Conf. 14.6 (Rev. CoP16) on <i>Introduction from the sea</i> and amend it as necessary. SUPPORT |
| <u>61</u> | Rapid movement of wildlife diagnostic samples and musical instruments | Standing Committee | Draft Decisions are proposed to share information on which Parties implement the lighter procedures for these two categories of specimens and for sharing lessons learned | It is essential to remove barriers to rapid movement of biological samples, especially where a disease outbreak has occurred. Similarly, failure to adopt the lighter procedures available for musical instruments can create unnecessary work for Management Authorities. In both cases, the inability to use lighter procedures because one or both Parties to the transaction do not apply them draws resources away from other tasks of greater importance. SUPPORT |
| <u>64.1</u> | Disposal of confiscated specimens: Report of the Standing Committee | Standing Committee | Proposes amendments to Resolution Conf. 17.8 (Rev. CoP19) on <i>Disposal of illegally traded and confiscated specimens of CITES-listed species</i> , in particular to ensure where a confiscated live specimen of an Appendix I species is given to a commercial captive breeding facility it does not promote illegal or irregular trade. Renewal of some existing Decisions and adoption of new ones also propose continued work on this issue | WWF supports the proposed amendments to the Resolution and the Decisions, and highlights the importance of ensuring the transfer of confiscated animals to captive breeding facilities does not risk the stimulation of illegal trade. We also encourage those Parties that have not already done so, to provide the information detailed in 19.171 such that this matter may be comprehensively addressed. SUPPORT |
| <u>67.1</u> | Review of CITES provisions related to trade in specimens of animals and plants not of wild source: Report of the Standing Committee | Standing Committee | Draft Decisions propose a workshop to discuss this issue for all sources (captive bred, artificially propagated, ranched, assisted production etc.) | The complexity of the various rules applying to such specimens stretch the capacities of CITES authorities and offer opportunities for abuses. SUPPORT |

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| <u>67.2</u> | Review of CITES provisions related to trade in specimens of animals and plants not of wild source: Considerations and recommendations for ranching of aquatic species | Mexico, United Kingdom of Great Britain and Northern Ireland and United States of America | Draft Decisions mandate the Animals and Standing Committees to consider whether the current definition of “ranching” (source code R) in Resolution Conf. 11.16 (Rev. CoP15) on <i>Ranching and trade in ranched specimens of species transferred from Appendix I to Appendix II</i> and in Resolution Conf. 12.3 (Rev. CoP19) on <i>Permits and certificates</i> needs to be revised in its application to aquatic species | Parties need to be extremely circumspect in their use of source code R for aquatic species. In most of the cases where it has been applied the condition that the specimens are taken at a point where they would otherwise have had a very low probability of surviving to adulthood (which, we agree, is unclear in its meaning) have not been met. We would propose the adoption of an additional Decision, directed to parties, to the effect that Parties should refrain from using source code R for aquatic species until the process outlined in Decisions 20.AA and 20.BB has been completed. SUPPORT WITH ADDITIONS |
| <u>68</u> | Review of Resolution Conf. 12.10 (Rev. CoP15) on <i>Registration of operations that breed Appendix I animals for commercial purposes</i> | Standing Committee | Proposes amendments to the Resolution, <i>inter alia</i> to allow for exclusion of certain products from the scope of the registration | WWF considers that the proposed changes will reduce the risk of unintended consequences on the wild population arising from commercial breeding operations. SUPPORT |
| <u>76.1</u> | Elephants: Implementation of Resolution Conf. 10.10 (Rev. CoP19) on <i>Trade in elephant specimens</i> | Secretariat, at the request of the Standing Committee | <ol style="list-style-type: none"> 1. It is proposed that the current Decisions on domestic ivory markets be renewed. 2. An amendment to the Resolution is proposed to ensure that Parties fund stockpile management adequately, accompanied by draft Decisions to provide for assistance to Parties with stockpile management. 3. A draft Decision encourages Parties to help the Secretariat to implement MIKE and ETIS | WWF supports the draft Decisions as far as they go but, as a donor to ETIS, we are alarmed that there is no draft Decision encouraging Parties and donor organisations to contribute funds to that programme (the same is true for MIKE, although we note that its funding situation is more secure). We consider it essential that an additional Decision is adopted encouraging Parties and donor organisations to contribute funds to ETIS in order to ensure its financial sustainability, as recommended by the ETIS review. SUPPORT WITH ADDITIONS |
| <u>76.3</u> | Elephants: Ivory stocks and stockpiles | Burkina Faso, Ethiopia, Kenya, Niger, Nigeria and Senegal | Proposes renewal of the CoP19 Decisions on this issue to maintain pressure on Parties to report stockpiles, to continue Standing Committee oversight and to encourage National Ivory Action Plan countries to step up their efforts | WWF agrees with the proponents of this document that continued oversight of the ivory stockpile issue is necessary. SUPPORT |

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| <u>76.5</u> | Elephants: Report on the Elephant Trade Information System (ETIS) | Secretariat | <p>The following countries are identified in the categorisation process:</p> <ul style="list-style-type: none"> Category A (most affected): Nigeria, Mozambique, Viet Nam, Democratic Republic of the Congo Category B (markedly affected): Angola Category C (affected): United Arab Emirates, China. <p>A draft Decision is tabled proposing further consideration by the Standing Committee of information exchange between ETIS and the Annual Illegal Trade reports</p> | <p>WWF considers that the remit of the proposed draft Decision is too broad and would reopen issues where SC78 already gave clear direction. In particular, the issue of data validation was dealt with at SC78, while the present report highlights the importance of taking data from as many sources as possible, and resolving unresolved records, as these factors can have a bearing on the categorisation of Parties. We do not consider that this needs further discussion. Instead, the draft Decision should focus on exploring means to minimize the need for double reporting. Finally, WWF also considers that the network analysis mandated by SC78 on a once-off basis has provided useful contextual information and should be a regular element in future reporting. FURTHER DISCUSSION NEEDED</p> |
| <u>77.1</u> | Implementation of Resolution Conf. 12.5 (Rev. CoP19) on <i>Conservation of and trade in tigers and other Appendix I Asian big cat species</i> | Secretariat | <p>Parties are invited to note the document and to delete the relevant CoP18 and CoP19 Decisions</p> | <p>WWF agrees to delete the Decisions, except for 18.105 as specific focus is still needed on leopard trade. Doc. 77.1, as with previous CoP reports, shows the paucity of information on ABC trade and implementation of related CITES measures, which inhibits effective CITES decision making and perpetuates trade as a significant threat to wild populations. We urge for an amendment to Res. Conf. 12.5 (Rev. CoP19) to include a new CoP reporting mechanism, similar to that for rhinos in Res. Conf. 9.14 (Rev. CoP19), which would engage consultants to gather and report on information from reliable sources, thus reducing the reporting burden on Parties and the Secretariat and improving CITES effectiveness. PARTIAL SUPPORT WITH ADDITIONS</p> |



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| <u>77.2</u> | Asian big cats in captivity | Standing Committee | Includes draft Decisions and SC recommendations directing Parties to implement measures to restrict the breeding of tigers in facilities that are not of conservation value and prevent the involvement of captive tigers in trade | WWF supports the adoption of the draft Decisions, with small amendments needed to provide greater clarity for the purposes of their implementation (details available upon request). For example, CITES has previously failed to define what is meant by 'large numbers', which also does not recognise the significant role facilities with small numbers of captive tigers can play in illegal trade. Additionally, the educational value of facilities should be recognised as part of the conservation value to wild tigers, not separate from it. We also urge that Parties note that specific guidance for assessing whether a captive facility breeding tigers is contributing to conservation is also available. SUPPORT WITH AMENDMENTS |
| <u>80</u> | African lions (<i>Panthera leo</i>) | Standing Committee, in consultation with the Animals Committee | Draft Decisions provide for cooperation between the CITES Secretariat, the CMS Secretariat, IUCN and others as appropriate, including on the making of non-detriment findings, and for continued oversight by the Animals and Standing Committees | It is important that the issue of trade in lions be kept in view by the CITES Committees, as current evidence suggest that it is an ongoing and growing risk. Accordingly, WWF suggests that the Decisions be reworded and, if necessary, reordered, so that: (i) the Secretariat issue a notification to Parties inciting them to report on activities under Decision 19.208; and (ii) the Secretariat be mandated to report on the outcomes of this Decision under Decision 19.207 (Rev. CoP20). SUPPORT WITH AMENDMENTS |
| <u>82</u> | Guidance on non-detriment findings for trade in leopard (<i>Panthera pardus</i>) hunting trophies | Animals Committee | Draft Decisions provide for Parties with trophy quotas to share information on the making of NDFs | WWF welcomes the draft Decisions which will provide a basis for re-examining existing leopard trophy quotas and for ensuring a strong basis for more realistic quotas going forward. SUPPORT |

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| <u>83</u> | Songbird trade and conservation management (Passeriformes spp.) | Standing Committee, in consultation with the Chair of the Animals Committee | Proposes deletion of Decisions 18.256 (Rev. CoP19) to 18.259 (Rev. CoP19) on <i>Songbird trade and conservation management (Passeriformes spp.)</i> | WWF welcomes the recommendations from the songbird workshop held in Thailand in 2023 and considers that there is scope for reviewing progress in their implementation and in lessons learned. Accordingly, we suggest that the CoP adopt a suite of Decisions (1) mandating the Secretariat to issue a notification to Parties inviting them to report on their implementation; and (2) mandating the Animals Committee to consider these reports and make further recommendations. SUGGEST NEW DRAFT DECISIONS |
| <u>84</u> | Rhinoceroses (Rhinocerotidae spp.) | Standing Committee and Secretariat | <p>Includes the recommendations of the Rhinoceros Enforcement Task Force meeting held in South Africa in May, and the IUCN-TRAFFIC report on the status of and trade in African and Asian Rhinoceroses. According to the latter, South Africa, Malaysia, Viet Nam, Qatar and the United Arab Emirates are the five countries most affected by poaching and trafficking of rhino horn, and the situation regarding Javan rhino in Indonesia is also highlighted.</p> <p>The document incorporates draft Decisions as follows:</p> <ol style="list-style-type: none"> 1. Parties where illegal horn markets exist are encouraged to develop demand reduction strategies and are urged to close markets that are contributing to illegal trade; 2. Parties affected by rhinoceros poaching and associated trafficking are encouraged to fully implement the strategies and proposed actions outlined in the CITES Rhinoceros Enforcement Task Force meeting, and to report to the Secretariat; 3. Indonesia is encouraged to strengthen measures and carry out activities to monitor and protect its Javan rhinoceros population; 4. The Secretariat is mandated to seek reports from Parties covered by the above Decisions and the Standing Committee is mandated to consider the Secretariat's report. | <p>In WWF's view the countries most affected by poaching and by illegal trade should be named in the respective Decisions. They should be required to report directly to SC81 and SC82 no later than 60 days before the opening of each meeting. Their reports should detail measures taken to target high-level offenders, and measures taken to implement the provisions of Resolution Conf. 9.6 (Rev. CoP19) on <i>Trade in readily recognisable parts and derivatives</i>. Noting that there are significant discrepancies and gaps in stockpile data, they should also report on stockpiles; we believe that this can be done without compromising security if locational and nominative information is redacted. Finally, there should be an explicit mandate to the Committee to consider measure under Resolution Conf. 14.3 (Rev. CoP19) on <i>CITES compliance procedures</i>. PARTIAL SUPPORT WITH ADDITIONS</p> |

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| <u>85.1</u> <u>Rev. 1</u> | Saiga antelopes: Report of the Secretariat | Secretariat | Draft Decisions encourage range, transit and consumer countries to: (1) implement the measures directed to them in the Medium-Term International Work Programme for the Saiga Antelope for 2025 - 2030; and (2) establish and report on internal market controls for saiga parts, including registration of stockpiles, labelling of parts and products, and recording of sources of saiga specimens contained in stockpiles monitoring and control measures and registration of manufacturers and traders | WWF welcomes the draft Decisions which will keep the implementation of saiga conservation measures under scrutiny, in particular the issue of stockpile management, about which concerns remain at present. SUPPORT |
| <u>85.2</u> | Saiga antelopes: Document by Kazakhstan and the Russian Federation | Kazakhstan and the Russian Federation | Draft Decisions are set out as follows: (1) Range and consumer countries should take all possible measures to establish the origin of saiga antelope parts and derivatives to be exported and re-exported from countries outside the saiga range, including but not limited to genetic analyses, enquiries to countries of suspected origin, and sufficient evidence that parts and derivatives were not obtained in violation of the laws of the country of origin; and (2) Source code “Unknown” (U) should not be used to trade in saiga antelope parts and derivatives for commercial purposes | WWF supports these draft Decisions in principle and suggests that an in-session working group be convened to merge them with those in Document 85.1. SUPPORT |
| <u>87</u> | Eels (<i>Anguilla</i> spp.) | Animals Committee and Standing Committee | Includes draft Decisions mandating further work on eels by the Secretariat and by the Animals and Standing Committees and a draft Resolution on <i>Conservation of and trade in anguillid eel species</i> (<i>Anguilla</i> spp.) | WWF welcomes this Resolutions, which will support the implementation of the existing Appendix II listing of <i>Anguilla anguilla</i> and has the potential to support implementation of an Appendix II listing for <i>Anguilla</i> spp. SUPPORT |
| <u>88.1</u> | Sharks and rays: Report of the Standing Committee | Standing Committee, in consultation with the Chair of the Animals Committee and the Secretariat | Proposes: (1) Draft amendments to Resolution Conf. 18.7 (Rev. CoP19) on <i>Legal acquisition findings</i> to strengthen the language regarding legislation applicable to marine species; (2) Draft Decisions directing further reporting by Parties, with follow-up by the Secretariat, and by the Animals and Standing Committees; and (3) Draft Decisions mandating consideration of a stock-level approach for the Review of significant trade in specimens of species listed in Appendix II | WWF welcomes the draft Decisions and the amendments to Resolution Conf. 18.7 (Rev. CoP19) on <i>Legal acquisition findings</i> . In particular, we welcome the proposals for consideration of a modified Significant trade process for sharks, as country-specific reviews are less than ideal. SUPPORT |

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| <u>88.2</u> | Sharks and rays: Draft Decisions on trade, conservation and management of deep-water elasmobranchs | European Union and United Kingdom of Great Britain and Northern Ireland | The draft Decisions mandate a study, leading to a workshop, whose outcomes would be considered by the Animals and Standing Committees | WWF recognises that future listings of deep-water elasmobranch species will raise new implementation challenges, especially regarding the making of non-detriment findings, and we support the draft Decisions. SUPPORT |
| <u>89</u> | Seahorses (<i>Hippocampus</i> spp.) | Standing Committee in consultation with the Chair of the Animals Committee | It is proposed to renew CoP19 Decisions directed to range, transit and consumer countries to improve reporting and to step up measures against illegal trade, while further decisions mandate work on a seahorse trade database and other capacity-building tools, and the Standing Committee is mandated to continue oversight of this issue | There have been persistent and basic problems with the implementation of the seahorse Appendix II listing by some key countries, so continued work is necessary. SUPPORT |
| <u>90</u> | Conservation of and trade in sea cucumbers (Holothuridae and Stichopodidae spp.) | United States of America | Draft Decisions mandate a study, leading to a workshop, and follow-up by the Animals and Standing Committees | Sea cucumbers are highly vulnerable to over-exploitation. Key range countries need support in managing the fisheries, both for listed and non-listed species. SUPPORT |
| <u>93</u> | Agarwood-producing taxa (<i>Aquilaria</i> spp. and <i>Gyrinops</i> spp.) | Standing Committee | Proposes amendments to Resolution Conf. 16.10 on <i>Implementation of the Convention for agarwood-producing taxa</i> to clarify definitions regarding artificially propagated and assisted wild-produced specimens and to revise the glossary of terms | WWF does not consider the revisions to be entirely satisfactory. In particular, we believe that trees grown in mixed plantations should never be considered as source code A, but rather as source code Y. We also consider that the definitions of exhausted and not exhausted powder are unsatisfactory and unhelpful; the exemption for exhausted powder should be removed, and we welcome the proposed work on this in Document CoP20 Doc. 103. We also consider that a draft Decision should be adopted to revisit the personal effects exemptions, which we consider to be too wide. FURTHER WORK REQUIRED |
| <u>94</u> | Boswellia trees (<i>Boswellia</i> spp.) | Plants Committee | Draft Decisions include a mandate to identify species that would benefit from CITES listing and convening of a range States meeting | WWF welcomes the draft Decisions, believing that some species should be listed on the Appendices as a matter of urgency, but recognising the importance of range State cooperation. SUPPORT |

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| <u>95</u> | Rosewood tree species [Leguminosae (Fabaceae)] | Plants Committee in consultation with Chair of Standing Committee | Draft Decisions would mandate further review of the study on Rosewood species | WWF welcomes this excellent study and supports the ongoing review. SUPPORT |
| <u>96</u> | Products containing specimens of Appendix II listed orchids (Orchidaceae spp.) | Standing Committee | Draft Decisions mandate preparation of a study on the edible orchid tuber trade for consideration by the Plants and Standing Committees | The growing trade in edible orchid tubers and products containing extracts from them presents new challenges in terms of sustainability and associated workload. SUPPORT |
| <u>102</u> | Considering the 'lookalike' criterion Annex 2b A of Resolution Conf. 9.24 (Rev. CoP17) on criteria for the amendment of Appendices I and II | United Kingdom of Great Britain and Northern Ireland | The document raises the issue of the large number of lookalike species that are listed in the Appendices and the associated burden, and proposes draft Decisions for consideration of the issue by the Animals, Plants and Standing Committees | WWF appreciates the workload implications of having large numbers of lookalike species on Appendix II (although we note that many are not in trade). However, we would be very cautious about tinkering with that criterion as it could compromise enforcement. UNABLE TO SUPPORT |
| <u>103</u> | Annotations | Standing Committee | Proposed technical amendment are tabled to Resolution Conf. 10.13 (Rev. CoP18) on <i>Implementation of the Convention for tree species</i> and to the Interpretation Section of the Appendices, while draft Decisions mandate further work on a number of plant annotations, including agarwood powder | WWF welcomes the draft Decisions, in particular the mandate to re-examine the agarwood annotation. SUPPORT |



Military orchid (*Orchis militaris*) - © Jama Krisova / Shutterstock



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